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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

JAN 25 1991

4WD-NSRB

Mr. Abel B. Dunning  
TES VII Region IV Manager  
CDM-FPC  
2030 Powers Ferry Road  
Suite 490  
Atlanta, GA 30339

RE: Lack of Technical Insight in Comments on Draft Remedial  
Investigation for the Medley Farm Superfund Site

Dear Mr. Dunning:

This letter is to document the Agency's dissatisfaction in the review and comments submitted to the Agency on the Revised Draft Remedial Investigation (RI) Report, dated December 1990, for the Medley Farm Superfund site under Work Assignment Number CO-4033. The Scope of Work attached to the Work Assignment Form for Work Assignment Number CO-4033 clearly calls for the Contractor, CDM-Federal Programs Corporation (CDM-FPC) to provide the Agency with comments from a technical review on documents submitted by the Potentially Responsible Parties (PRPs), not an editorial review. Out of nineteen comments submitted to the Agency in a correspondence dated January 14, 1991, only two had any technical orientation. The rest of the comments identified either grammatical or printing miscues. A technical review does not consist of identifying typing or reproduction errors.

The Medley Farm draft RI is very similar to other RI reports in that the PRPs' contractor, Sirrine Environmental Consultants (SEC), made numerous assumptions and conclusions based on the information collected during the RI field work. A large number of these assumptions/conclusions were based on their professional interpretation of the data. The Agency was expecting CDM-FPC to provide their own technical, expertise in reviewing this draft RI report. CDM-FPC comments should of focused on these assumptions/conclusion and either concur or challenge the assumptions/conclusions SEC stated in this report. CDM-FPC clearly missed the mark in this review.

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I trust the review of the Medley Farm Draft Feasibility Study, dated December 1990, will receive a technical review and not an editorial one.

If you have any questions, please contact me at 347-7791.

Sincerely yours,

Jon K. Bornholm  
Remedial Project Manager

cc: Jean Wright, EPA HQ TES VII Zone Project Officer  
Ken Meyer, EPA Region IV Project Officer

MEDLEY FARM #2 MM DISK, FILE: DISSATT7, DRAFT 1/18/91, FINAL 1/25/91

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*JKB 1/25/91*